

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

1. ALLSTATE FIRE AND CASUALTY
INSURANCE COMPANY,
Plaintiff,

v.

1. TRENTON HATTLER, and
2. BETSY SMITH,
Defendants.

Case No. CIV-22-117-J

**DEFENDANT BETSY SMITH'S ANSWER TO ALLSTATE'S COMPLAINT
FOR DECLARATORY JUDGMENT**

ANSWER

Betsy Smith, for answer to the Complaint, states:

1. She admits to paragraphs 1-12, 14-21, 24, and 26.
2. No response is required to paragraphs 13 and 25, which contain no factual allegation.
3. Admits the allegations of paragraphs 22 and 23 as to the policy containing the language stated from the policy but denies the allegation of paragraph 22 that the GMC was not a "Non-owned Auto" and the allegation of paragraph 23 that the Policy does not extend Liability Coverage for the accident.
4. States on information and belief that the GMC truck was provided not for the use of Mr. Hattler but for the use of Mr. Hattler's employer.

Wherefore, Ms. Smith asks that Allstate take nothing by its complaint and for all relief to which Ms. Smith is entitled by law.

Respectfully submitted,

s/Rex Travis

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of March, 2022, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing. Based on the current records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to those registered participants of the Electronic Case Filing System.

s/ Rex Travis